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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SINO-FOREST CORPORATION,

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 13- 10361 (MG)

**NOTICE OF FILING REVISED SETTLEMENT ORDER AND  
REVISED RECOGNITION ORDER**

**PLEASE TAKE NOTICE** that the Class Action Plaintiffs intend to submit a revised *Order* (the “**Revised Settlement Order**”) approving the settlement with David Horsley to the Ontario Superior Court of Justice at the hearing on the Class Action Plaintiffs’ motion seeking such relief scheduled for July 24, 2014 at 9:00 a.m. The Revised Settlement Order and a blackline marked to show the changes from the previous version filed with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) as Docket No. 43-2 are attached hereto as **Exhibit A** and **Exhibit B**, respectively.

**PLEASE TAKE FURTHER NOTICE** that the Class Action Plaintiffs hereby submit the revised proposed *Order Recognizing and Enforcing Order of Ontario Superior Court Approving Settlement with David Horsley* (the “**Revised Recognition Order**”). The proposed Revised Recognition Order and a blackline marked to show the changes from the previous version filed with the Bankruptcy Court as Docket No. 43 are attached hereto as **Exhibit C** and **Exhibit D**, respectively. The parties reserve the right to further revise the Revised Settlement Order and the Revised Recognition Order.

Dated: July 23, 2014  
New York, New York

*Respectfully Submitted,*

**LOWENSTEIN SANDLER LLP**

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